

Cryslar, Ruby

From: Rachel Pierson [KDHE] <Rachel.Pierson@ks.gov>
Sent: Monday, May 14, 2018 11:10 AM
To: Cole Knight (cole.knight@us.af.mil)
Cc: Cryslar, Ruby; brian.wight@aecom.com; Gary Richards [KDHE]; Jesse G. Saegert [KDHE]; Randy Carlson [KDHE]
Subject: RE: KDHE Replies to Responses to KDHE Comments on the Final SWMU No. 207 RCRA Facility Investigation Report; McConnell AFB
Attachments: RE KDHE Replies to Responses to KDHE Comments on the Final SWMU No. 207 (SS544) RCRA Facility Investigation Report; McConnell AFB.pdf
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Good morning,

Attached is correspondence from Randy Carlson of the Kansas Department of Health and Environment – Bureau of Environmental Remediation (KDHE-BER). If you have any questions, please contact Randy at 785-296-1675 or randy.carlson@ks.gov.

Note: Mr. Knight, hard copy to follow.

Thank you,

Rachel Pierson
Administrative Assistant
KDHE-BER

RCRA



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May 14, 2018

Mr. Cole Knight
AFCEC/CZOM
57830 Pittsburg St., STE 120
McConnell AFB, KS 67221

Subject: KDHE Replies to the Responses to KDHE comments on the Final SWMU No. 207 (SS544) RCRA Facility Investigation Report, McConnell Air Force Base

Dear Mr. Knight,

The Kansas Department of Health and Environment/Bureau of Environmental Remediation (KDHE/BER) has reviewed the responses to our comments on the above referenced document received by email May 10, 2018 and provides the following replies.

KDHE Comment 1: The identification of the Ramp 400 Area as a potential source for VOC contamination is not adequately supported by groundwater data presented in this report and the lack of detected VOCs in the soil samples collected in this area.

URS Response: At the Ramp 400 area, the suspected release mechanism of contaminants of concern (COCs) to groundwater is the infiltration of storm water (surface runoff) containing dilute concentrations of COCs from a large portion of the Former Boeing tarmac, a >70 acre area with a long history of aircraft maintenance activities. The following lines of evidence support our proposed conceptual site model (CSM) for Ramp 400:

1. Storm water runoff from the Former Boeing tarmac is directed north towards the grass-lined culvert and then south along the concrete-lined culvert (see **Figure 1**). Field observations during RFI sampling events confirmed pooling of water in the grass-lined culvert during/after a storm event. Surface runoff entering the grass-lined culvert has the potential to infiltrate the subsurface (and the underlying paleochannel deposits), serving as a source of COCs during historical maintenance activities on the tarmac.
2. The distribution of contaminant mass in groundwater in the paleochannel deposits is centered in the Ramp 400 area. Specifically, local maximum concentrations of Carbon Tetrachloride (see Figure 3-8 of the RFI report), 1,1 Dichloroethene (see Figure 3-9 of the RFI report), and Trichloroethene (see Figure 3-10 of the RFI report) were identified at monitoring well MW-178, located alongside the grass-lined culvert of the Ramp 400 area (see **Figure 1**). Elevated concentrations of these COCs were also detected at other Ramp 400 monitoring wells (MW-34, MW-179, MW-180, MW-182).

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3. Benzene and Toluene were detected in soil samples from boring SB-3 during the RFI (see Table 3-3 of the RFI report). This is consistent with our proposed CSM for Ramp 400, where contaminated runoff consists of a mixture of various COCs infiltrated the subsurface.

KDHE Reply: The additional explanation adequately supports considering the Ramp 400 Area as a "potential" source area. Response accepted.

KDHE Comment 2: Figures: In 2016, Boeing conducted a detailed property boundary survey ("Alta Survey"), which indicated that the property boundary between the former Boeing property and McConnell Air Force Base did not match the previously marked boundary. KDHE/BER requests that the property boundaries included in this report reflect the updated survey.

URS Response: Although the boundary line does not impact the RFI results, the changes will be made to the figures, and replacement pages will be issued.

KDHE Reply: Response accepted.

If you have any questions, please feel free to call me at 785-296-1675, send an email to randy.carlson@ks.gov, or send correspondence to the address below.

Sincerely,



Randy Carlson, PhD, PG
Chief, Remedial Section
KDHE/BER
1000 SW Jackson Street, Suite 410
Topeka, KS 66612-1367

cc: Randy Carlson → Margaret Townsend → McConnell AFB SWMU 207 (C2-087-71892-1)
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